

1 **HONE LAW**

Jill Garcia, NV Bar No. 7805

2 jgarcia@hone.law

Eric D. Hone, NV Bar No. 8499

3 ehone@hone.law

701 N. Green Valley Parkway, Suite 200

4 Henderson, NV 89074

Phone 702-608-3720

5 Fax 702-703-1063

6 *Attorneys for Defendants*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 DONAVAN McINTOSH,

10 Plaintiff,

11 vs.

12 CITY OF NORTH LAS VEGAS, a Municipal
Corporation and political subdivision of the
13 State of Nevada; PAMELA OJEDA in her
official and/or individual capacities; CLINTON
14 RYAN in his official and/or individual
capacities; ALEJANDRO RODRIGUEZ in his
15 official and/or individual capacities; DOES I-X,

16 Defendants.

Case No.: 2:21-cv-01505-APG-EJY

**JOINT STIPULATED REQUEST
AND ~~[PROPOSED]~~ ORDER TO
CONTINUE DATE OF EARLY
NEUTRAL EVALUATION SESSION**

[First Request]

17
18 Plaintiff Donovan McIntosh (“Plaintiff”) and Defendants City of North Las Vegas,
19 Pamela Ojeda, Clinton Ryan and Alejandro Rodriguez (“Defendants”) (“Parties”), by and
20 through their respective undersigned counsel, submit the following Joint Stipulated Request and
21 [Proposed] Order to Continue the April 26, 2022 Early Neutral Evaluation Session (“ENE”)
22 [ECF No. 14] request as follows:

23 On August 13, 2021, the Court scheduled the ENE for October 13, 2021 and further set
24 the deadline to submit Confidential ENE Statements for October 6, 2021. [ECF No. 7]. On
25 October 13, 2021, the Court conferred with both parties and the matter did not get resolved.

26 The Court continued the ENE to April 26, 2022 at 10:00 a.m. and set a deadline of April
27 19, 2022 for supplemental confidential statements.

28 ///



1 On January 17, 2022, Plaintiff filed a Motion to Extend Discovery Deadlines requesting
2 to extend the discovery cutoff for a period of 120 days because Plaintiff was having surgery and
3 counsel had conflicts requiring additional time to complete discovery. On February 8, 2022, the
4 Court granted Plaintiff's Motion moving the discovery cutoff date to June 7, 2022. Plaintiff's
5 deposition is currently scheduled for April 21, 2022 and the Parties anticipate scheduling the
6 remaining depositions for the months of April and May.

7 Therefore, the Parties respectfully request the ENE Session be continued for a period of
8 not less than thirty (30) days such that the Parties can complete substantive discovery prior to re-
9 engaging in settlement discussions.

10 The Parties and their client representatives are available on June 6, 8, 13, 14 and 16,
11 2022.

12 The Parties hereby request that the Court continue the April 26, 2022 ENE to one of the
13 proposed dates contained herein.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///



1 This Joint Request and Proposed Order is sought in good faith and not for the purposes of
2 delay.

3 This is the first request to continue the ENE.

4 IT IS SO STIPULATED.

5 Dated this 6th day of April 2022.

Dated this 6th day of April 2022.

6 HONE LAW

KEMP & KEMP, ATTORNEYS AT LAW

7 /s/ Jill Garcia

/s/ James P. Kemp

8 Jill Garcia, NV Bar No. 7805

James P. Kemp, NV Bar No. 6375

9 jgarcia@hone.law

jp@kemp-attorneys.com

Eric D. Hone, NV Bar No. 8499

7435 W. Azure Drive, Suite 110

ehone@hone.law

Las Vegas, NV 89130

10 701 N. Green Valley Parkway, Suite 200

Attorneys for Plaintiff

Henderson, NV 89074

11 *Attorneys for Defendants*

12
13
14 **ORDER**

15 IT IS HEREBY ORDERED that the Early Neutral Evaluation in this matter will be

16 rescheduled to June 8, 2022 at 10:00 a.m./~~p.m.~~ The supplemental confidential

17 statements will be due to chambers one week prior, on June 1, 2022 at 4:00 PM

18 ~~a.m./p.m.~~

19
20 

21 UNITED STATES MAGISTRATE JUDGE

4-6-2022

22 DATED: _____

